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July 7, 2005

BY OVERNIGHT DELIVERY AND E-FILE

Mary L. Cottrell, Secretary
Department of Telecommunications and Energy
One South Station
Boston, MA 02110

Re: Bay State Gas Company, D.T.E. 05-27

Dear Ms. Cottrell:

Enclosed for filing, on behalf of Bay State Gas Company ("Bay State"), please find Bay State's responses to the following Record Requests:

From the Attorney General:

RR-AG-6 RR-AG-16 RR-AG-17 RR-AG-19

From the Department:

RR-DTE-1

Please do not hesitate to telephone me with any questions whatsoever.

Very truly yours,

Patricia M. French

cc: Per Ground Rules Memorandum issued June 13, 2005:

Paul E. Osborne, Assistant Director – Rates and Rev. Requirements Div. (1 copy)
A. John Sullivan, Rates and Rev. Requirements Div. (4 copies)
Andreas Thanos, Assistant Director, Gas Division (1 copy)
Alexander Cochis, Assistant Attorney General (4 copies)
Service List (1 electronic copy)

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

RESPONSE OF BAY STATE GAS COMPANY TO
RECORD REQUESTS FROM THE ATTORNEY GENERAL
D.T.E. 05-27

Date: July 7, 2005

Responsible: Stephen H. Bryant, President

RR-AG-6: Did the company provide a copy of the Baryenbruch study to the department?

Response: Yes. Please see the Company's response to DTE-5-1 for a copy of the requested study.

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RESPONSE OF BAY STATE GAS COMPANY TO
RECORD REQUESTS FROM THE ATTORNEY GENERAL
D.T.E. 05-27

Date: July 7, 2005

Responsible: Stephen H. Bryant, President

RR-AG-16: Provide the number of Itron devices in use in test year.

Response: Please see the Company's response to AG-15-04 (B) for the number of Itron devices in use during the test year.

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RESPONSE OF BAY STATE GAS COMPANY TO
RECORD REQUESTS FROM THE ATTORNEY GENERAL
D.T.E. 05-27

Date: July 7, 2005

Responsible: Stephen H. Bryant, President

RR-AG-17: Provide cost-benefit analysis for decision to do a sale lease back of Itron.

Response: Please see the Company's response to Attachment AG-3-32 (a) for a copy of the cost-benefit analysis associated with the decision to replace the Metscan meter reading system with an Itron meter reading system.

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

RESPONSE OF BAY STATE GAS COMPANY TO
RECORD REQUESTS FROM THE ATTORNEY GENERAL
D.T.E. 05-27

Date: July 07, 2005

Responsible: Danny G. Cote, General Manager

RR-AG-19: Provide revised response to AG14-11 using the word “contacted” not “contracted” in the following question - Has the Company ever contacted a corrosion or leak consultant (either a third party or employee of an affiliate with the appropriate expertise) regarding its distribution system? If “yes”, identify the consultant or affiliate employee and produce all documents, including but not limited to reports, letters, memorandums and e-mails to, from and by the consultant or employee of an affiliate concerning the Company’s distribution system.

Response: Bay State Gas uses outside contractors to do all of its annual leak and corrosion surveys. One of the services the leak and corrosion survey contractors provide is to troubleshoot any problems that may arise. To the best of Bay State’s knowledge and following a reasonable inquiry, it is my belief that because Bay State conducts continuous leak surveys, it has not found the need to contact outside consultants for additional expertise regarding corrosion or leaks in the Bay State distribution system. Bay State surveys exceed both the regulatory requirements and typical industry practice and have allowed it to operate and maintain an effective and efficient system. (See AG 2-16(b)). The data associated with Bay State’s corrosion and leak survey results is available for review at each of Bay State’s operational centers.

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

RESPONSE OF BAY STATE GAS COMPANY TO THE
ELEVENTH SET OF INFORMATION REQUESTS FROM THE ATTORNEY GENERAL
D. T. E. 05-27

Date: July 7, 2005

Responsible: Stephen H. Bryant, President

RR-DTE-1: How many BSG employees were union members in 1997 and how many were not union members in 1997?

Response: As of December 31, 1997, Bay State employed the following number of full-time personnel:

The number of full time BSG union employees:	443
The number of full time BSG non-union employees:	<u>346</u>
Total	789